

***United States Court of Appeals
for the Second Circuit***



**APPELLANT'S
REPLY BRIEF**

76 - 7146

76-7146

UNITED STATES COURT OF APPEALS
FOR THE SECOND JUDICIAL CIRCUIT

DOCKET NUMBER 76 - 7146

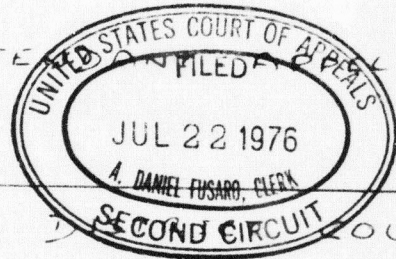
BISWANATH HALDER,

PLAINTIFF - APPELLANT,

V

QUOTRON SYSTEMS, INCORPORATED,

DEFENDANT - APPELLEE.



APPEAL FROM THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

REPLY BRIEF FOR PLAINTIFF - APPELLANT

BISWANATH HALDER

APPELLANT PRO SE

173-17 65 AVENUE

FRESH MEADOWS, NY 11365

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ARGUMENT

THE APPELLANT HOLDS A BACHELOR'S DEGREE IN ELECTRICAL ENGINEERING (B.E.) FROM THE UNIVERSITY OF CALCUTTA. UPON RECOGNITION OF HIS ACADEMIC ACHIEVEMENT AND TRAINING, THE UNITED STATES GOVERNMENT GRANTED HIM AN IMMIGRANT VISA. ALSO, BASED UPON HIS ACADEMIC CREDENTIALS, THE NEW YORK UNIVERSITY (NYU) ADMITTED HIM TO THE MASTER'S DEGREE COURSE IN BUSINESS ADMINISTRATION, AND THE INSTITUTE OF ELECTRICAL AND ELECTRONICS ENGINEERS (IEEE) ADMITTED HIM TO ITS MEMBERSHIP. SINCE THE US GOVERNMENT, THE NYU, AND THE IEEE RECOGNIZE HIS ACADEMIC CREDENTIALS, NONE IN THE ENTIRE WORLD, INCLUDING THE APPELLEE, CAN CHALLENGE THE VALIDITY OF THE APPELLANT'S ACADEMIC DEGREE AND TRAINING.

PRIOR TO COMING TO THE UNITED STATES, THE APPELLANT HAD GAINED EXPERIENCE IN WRITING DIAGNOSTIC PROGRAMS (WRITTEN IN ASSEMBLY LANGUAGE) — PROGRAMS TO DIAGNOSE COMPUTER MALFUNCTIONING — FOR TWO YEARS WITH TWO OF THE FIVE LARGEST COMPUTER MANUFACTURERS OF THE WORLD. TO-DAY THOSE TWO COMPANIES ARE ALIVE AND WELL. AND SINCE THE APPELLANT LEFT THEM, THEIR MARKET SHARE IN THE WORLD DID NOT GO DOWN — ON THE CONTRARY, THEY HAVE GONE UP SUBSTANTIALLY. THEREFORE, NONE IN THE ENTIRE WORLD, INCLUDING THE APPELLEE, CAN QUESTION THE BONA FIDE OF THE APPELLANT'S PROFESSIONAL EXPERIENCE.

ALSO, THE APPELLEE IS EXTREMELY WELL AWARE THAT HARDLY ANY OF ITS PROGRAMMERS' FUNCTIONAL CAPABILITIES EXCEEDS THOSE OF THE APPELLANT.

INSPIRE OF POSSESSING SUCH QUALIFICATIONS,
THE APPELLANT HAS NEVER BEEN CONSIDERED
FOR A JOB BY THE APPELLEE (AMENDED
COMPLAINT, PAGES 2, 3 & 4. PARA 6) , ALTHOUGH
THE APPELLEE'S JOB REQUIREMENTS (EXHIBITS
A THROUGH T) PERFECTLY MATCHED THE
APPELLANT'S BACKGROUND — TRAINING IN
ELECTRICAL ENGINEERING WITH SPECIALIZATION
IN LINE COMMUNICATIONS AND ELECTRONICS,
AND STRONG ASSEMBLY LANGUAGE EXPERIENCE
WITH MINI-COMPUTERS (EXHIBIT U).

IN A DESPERATE AND MALICIOUS
ATTEMPT TO COVER-UP ITS DISCRIMINATORY
EMPLOYMENT POLICIES AND PRACTICES, THE
APPELLEE STATES :

"TO DATE, THERE HAS BEEN NO FINDING BY
ANY COURT OR COMMISSION AS TO
DISCRIMINATORY ACTS ALLEGED BY THE
APPELLANT HEREIN AS TO THE APPELLEE OR
ANY OTHER PARTIES AGAINST WHOM THE

APPELLANT HAS PROCEEDED." APPELLEE'S
BRIEF, PAGE 4.

THE ONLY COURT THE APPELLEE IS
AWARE OF IS JUDGE MISHLER'S COURT. AND
THE ONLY COMMISSION DECISIONS THE APPELLEE
IS AWARE OF ARE THE DECISIONS AGAINST
THE CORPORATIONS WHO THE APPELLANT HAS
SUED IN JUDGE MISHLER'S COURT.

THE APPELLEE IS EXTREMELY WELL AWARE
THAT JUDGE MISHLER DID NOT AND WILL NOT
FIND ANY PROBABLE CAUSE OF DISCRIMINATION
AGAINST ANY OF THE CORPORATE DEFENDANTS.
ON THE CONTRARY, THE JUDGE, IN EVERY
POSSIBLE AND EVEN IN SOME IMPOSSIBLE
WAYS, AIDING, ABETTING, AND INSTIGATING
THE UNLAWFUL AND ILLEGAL POLICIES AND
PRACTICES OF THE CORPORATE DEFENDANTS.

THE APPELLEE IS ALSO EXTREMELY WELL
AWARE THAT THE COMMISSIONS ARE PART OF
THIS CORRUPT AND REPRESSIVE SYSTEM. FAR

FROM DOING ANY INVESTIGATION, THE COMMISSIONS REPORTED IN THEIR DETERMINATIONS WORD FOR WORD, WHAT THE CORPORATE DEFENDANTS TOLD THEM TO DO. DESPITE THE FACT THAT THE DEFENDANTS ADMITTED TO THE EEOC THAT A PROGRAMMER WITH ELECTRICAL ENGINEERING BACKGROUND IS HARDER TO FIND (HALDER V AEA, 74 C 1375, ED OF NY, PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT DATED MARCH 6, 1975, EXHIBIT E). AND THAT DURING THE PERIOD THE APPELLANT HAS BEEN LOOKING FOR EQUAL EMPLOYMENT OPPORTUNITIES IN THE LAND OF OPPORTUNITY, THE AMERICAN CORPORATIONS HAVE BEEN DESPERATELY TRYING TO RECRUIT COMPUTER PROGRAMMERS (HALDER V AVIS, 74 C 1352, ED OF NY, PLAINTIFF'S CROSS-MOTION FOR SUMMARY JUDGMENT DATED AUGUST 25, 1975, EXHIBIT F).

THE APPELLEE FURTHER JUSTIFIES ITS

DISCRIMINATORY POLICIES AND PRACTICES
BECAUSE NOT ONLY IT, BUT EACH AND EVERY
OTHER CORPORATION WHERE THE APPELLANT
SOUGHT EMPLOYMENT, REFUSED TO OFFER HIM
A JOB :

"HAD [THE APPELLANT] BEEN OFFERED JOBS BY
EVERY COMPANY OTHER THAN THE APPELLEE,
PERHAPS A CASE FOR DISCRIMINATION COULD
BE MADE." APPELLEE'S BRIEF; PAGE 6.

THE APPELLEE AND ITS \$100,000+ A
YEAR ATTORNEY (WHOSE ABSOLUTE MINIMUM
BILLING RATE IS ONE HUNDRED DOLLARS AN
HOUR), HAVE FAILED TO REALIZE THE
FUNDAMENTAL FACT THAT, IF ALL BUT ONE
CORPORATION WOULD HAVE REFUSED TO HIRE
THE APPELLANT, HE WOULD HAVE NEVER
SOUGHT THE PROTECTION OF THE COURT.

IN ANOTHER WELL-CALCULATED ATTEMPT
TO DISCREDIT THE APPELLANT, THE APPELLEE
STATES :

"WHERE HUNDREDS OF COMPANIES HAVE DETERMINED THE APPELLANT TO BE UNQUALIFIED FOR VACANT POSITIONS, THERE IS CONSIDERABLE DOUBT THAT DISCRIMINATION WAS THE BASIS FOR THESE DECISIONS." APPELLEE'S BRIEF, PAGE 6

THE APPELLANT MAY RESPECTFULLY POINT OUT THAT WHEN WILLIAM ROLEMAN CAME OUT OF HARVARD LAW SCHOOL MAGNA CUM LAUDE, HE WANTED A JOB IN HIS NATIVE PHILADELPHIA. HE DID NOT APPLY TO ONE LAW FIRM, BUT ALMOST TO EACH AND EVERY LAW FIRM IN PHILADELPHIA — WITHOUT ANY SUCCESS.

THE APPELLANT MAY FURTHER RESPECTFULLY POINT OUT THAT WHEN JACOB MISHLER CAME OUT OF LAW SCHOOL, IF HE WOULD HAVE APPLIED TO EACH AND EVERY MAJOR LAW FIRM IN THE UNITED STATES FOR A JOB, HE WOULD NOT GOTTEN AN OFFER FROM ANYBODY.

THIS HARD AND COLD FACT — THAT
THE APPELLANT UNSUCCESSFULLY SOUGHT
EMPLOYMENT WITH HUNDREDS OF AMERICAN
CORPORATIONS — DOES NOT JUSTIFY THE
APPELLEE'S CONDUCT. IT SIMPLY SHOWS HOW
DEEP-ROOTED AMERICA'S PROBLEM IS, EVEN
AFTER TWO HUNDRED YEARS OF DEMOCRACY,
AND A DOZEN YEARS AFTER THE PASSAGE OF
CIVIL RIGHTS ACT BARRING DISCRIMINATION
IN EMPLOYMENT.

POINT I THE APPELLEE, WITH FULL SUPPORT
AND APPROVAL OF THE DISTRICT
COURT, HAS ALL THROUGH REFUSED
FULL AND COMPLETE DISCLOSURE TO
THE APPELLANT.

THE APPELLEE STATES : "IN COURT, ON
THE RETURN DATE OF THE APPELLANT'S MOTION
TO COMPEL RESPONSES [TO THE INTERROGATORIES]
THE ATTORNEYS FOR THE APPELLEE, AS WELL AS
THE COURT SUGGESTED TO THE APPELLANT THAT
IF THE INFORMATION SOUGHT IN THOSE
INTERROGATORIES WAS SO VITAL TO HIS CASE,
HE MIGHT AT HIS OWN EXPENSE AND TIME
REVIEW THE RECORDS OF THE APPELLEE AT
A MUTUALLY CONVENIENT TIME." APPELLEE'S
BRIEF, PAGE 11.

THAT IS A LIE. NEITHER THE APPELLEE,
NOR THE COURT, HAVE EVER MADE ANY SUCH
SUGGESTION. BASED UPON THE ABSENCE OF

ANY COURT RECORDING SYSTEM ON THAT DAY AND TIME, THE APPELLEE DARES SAY SUCH A LIE.

IN HIS INTERROGATORIES, THE APPELLANT PRIMARILY ASKED FOR THE QUALIFICATIONS OF THE PROGRAMMERS AND ANALYSTS HIRED BY THE APPELLEE SINCE 1969. THE APPELLEE OBJECTED TO THOSE INTERROGATORIES ON GROUNDS OF BURDENSOMENESS AND OPPRESSIVENESS. THE APPELLEE FURTHER STATED THAT THE INTERROGATORIES "CAN SERVE NO USEFUL FUNCTION IN THIS PRESENT MATTER OTHER THAN TO HARASS THE DEFENDANT." DEFENDANT'S OBJECTIONS TO INTERROGATORIES DATED MARCH 4, 1975, PAGE 3.

THE APPELLANT THEN MOVED TO COMPEL THE APPELLEE TO ANSWER THOSE INTERROGATORIES. IN ITS AFFIRMATION IN OPPOSITION TO THE SAID MOTION BY THE APPELLANT, THE APPELLEE ARGUED :

"AN EXAMINATION OF THE INTERROGATORIES OBJECTED TO WILL REVEAL THE UNDUE BURDEN WHICH THE PLAINTIFF SEEKS TO IMPOSE UPON THE DEFENDANT. DISCLOSURE, ALTHOUGH BROAD IN THE FEDERAL FORUM, REQUIRES SPECIFICITY AND RELEVANCE, BOTH OF WHICH ARE LACKING HEREIN." FECHNER AFFIDAVIT OF 04.11.1975, PAGE 2.

THE DISTRICT COURT, ON JUNE 13, 1975, SUSTAINED THOSE OBJECTIONS ON THE GROUND THAT THE INFORMATION SOUGHT WOULD HAVE LIMITED PROBATIVE VALUE ON THE APPELLANT'S CASE.

IMMEDIATELY THEREAFTER THE APPELLANT MOVED FOR REARGUMENT OF THE SAID MOTION. THE DAY PRIOR TO THE DISMISSAL OF THE COMPLAINT, THE DISTRICT COURT DENIED THE SAID MOTION BECAUSE "[THE APPELLANT] OFFER[ED] NO FACT OR PRINCIPLE OF LAW THAT HAS NOT PREVIOUSLY BEEN CONSIDERED [BY THE COURT]".

ON FEBRUARY 10, 1976, THE DISTRICT COURT REAFFIRMED ITS EARLIER DECISIONS OF 06.13.1975 AND 02.09.1976 :

"YOU WEREN'T ENTITLED TO IT. YOU WEREN'T ENTITLED TO IT THEN. YOU'RE NOT ENTITLED TO IT NOW. YOU WILL NOT BE ENTITLED TO IT TOMORROW, NEXT WEEK OR NEXT YEAR."
TRIAL TRANSCRIPT, PAGE 16.

AT LONG LAST, THE APPELLEE IS ADMITTING THE VALIDITY OF THE INFORMATION SOUGHT BY THE APPELLANT THROUGH INTERROGATORIES. A RESOLUTION OF THE ISSUE CALLS FOR THE REVERSAL OF THE LOWER COURT'S DECISION, AND A FAIR TRIAL AFTER A FULL DISCOVERY.

THEREFORE, THE ARGUMENT SET FORTH BY THE APPELLEE IN POINT 1 MERELY COVERS UP THE FUNDAMENTAL FACT AND BEARS NO SUBSTANCE.

POINT II THE DISTRICT COURT HAS ABUSED
ITS DISCRETIONARY POWER IN AWARDING
ATTORNEYS' FEES TO THE APPELLEE.

"THIS IS NOT A SITUATION WHERE THE
GIANT IS ATTEMPTING, BY SIZE ALONE, TO STIFLE
THE LITTLE MAN IN HIS ATTEMPTS TO SEE THAT
JUSTICE IS DONE." APPELLEE'S BRIEF, PAGE 20.
THIS IS AN UNIQUE SITUATION WHERE THE COURT
IS "INFLICT[ING] THE VERY [WRONG] WHICH [IT]
[WAS] CREATED TO PREVENT." HOVEY V ELLIOTT,
1897, 167 U.S. 409, 418. 17 S.Ct. 841, 844.

THOUSANDS OF INDIANS ARE GIVING SLAVE
LABOR IN AMERICA. AMERICA LOVES THEM.
TO-DATE ONLY ONE (OUT OF ONE HUNDRED
THOUSAND) HAS SPOKEN UP AGAINST THIS
CORRUPT AND REPRESSIVE SYSTEM. THAT ONE
OUGHT TO BE DESTROYED. HE HAS TO PAY FOR
THE FEES OF HIS OPPONENT'S COUNSEL, BECAUSE
THE VERY UNLAWFUL AND ILLEGAL POLICIES

AND PRACTICES OF HIS OPPONENT HAVE FORCED HIM TO RESORT TO COURT FOR PROTECTION.

THE JUDGE — WHO HAS BEEN ON THE BENCH FOR MORE THAN FIFTEEN YEARS, AND PRIOR TO THAT HAD BEEN A MEMBER OF THE BAR FOR MORE THAN TWENTY-FIVE YEARS — IS WELL AWARE THAT THERE IS NO PRECEDENT IN THE HISTORY OF THE UNITED STATES OF A POOR MAN PAYING FOR THE ATTORNEYS' FEES OF A CORPORATE DEFENDANT.

THE JUDGE IS ALSO EXTREMELY WELL AWARE "THAT THE COURTS ARE NOT AUTHORIZED TO EXERT THEIR POWER IN THAT WAY." WINDSOR V McVEIGH, 1876, 93 U.S. (23 WALLACE) 276, 283.

POINT III THE DISTRICT COURT HAS ABUSED ITS
DISCRETIONARY POWER IN DISMISSING
THE COMPLAINT FOR LACK OF
PROSECUTION, WHILE THE APPELLANT
HAS BEEN PROSECUTING IT VIGOROUSLY
AND DILIGENTLY.

IN THE CASES CITED BY THE APPELLEE,
WHERE THE APPELLATE COURTS HAVE AFFIRMED
THE LOWER COURTS' DISMISSAL OF THE COMPLAINTS
FOR LACK OF PROSECUTION, THE FACTS DO
DEPICT "A DRAWN-OUT HISTORY" OF "DELIBERATELY
PROCEEDING IN DILATORY FASHION." LINK V
WABASH RAILROAD COMPANY, 1962, 370 U.S. 626,
633, 82 S.Ct. 1386, 1390.

OTHERWISE, THE APPELLATE COURTS HAVE
UNIFORMLY REVERSED THE DISTRICT COURTS.
INDUSTRIAL BUILDING MATERIALS, INC. V
INTERCHEMICAL CORPORATION, 437 F.2D 1336, 2A
9 1970; PETERSON V TERM TAXI, INC., 429

F.2D 888, CA 2 1970; MCCOMBS V PITTSBURGH-
DES MOINES STEEL COMPANY, 426 F.2D 264,
CA 10 1970; SYRACUSE BROADCASTING CORPORATION
V NEWHOUSE, 271 F.2D 910, CA 2 1959;
PEARSON V CHAPMAN, 169 F.2D 909, CA 3 1948;
CARNEGIE NATIONAL BANK V CITY OF WOLF
POINT, 110 F.2D 569, CA 9 1940. BECAUSE
RULE 41(b) OF THE FEDERAL RULES OF CIVIL
PROCEDURE HAS DIRECTLY REVERSED EQUITY'S
TRADITIONAL DOCTRINE THAT A DISMISSAL
WITHOUT CONSIDERATION OF THE MERITS IS
ALSO WITHOUT PREJUDICE TO THE COMPLAINANT.
SWAN LAND & CATTLE COMPANY V FRANK, 1893,
148 U.S. 603, 612, 13 S.Ct. 691, 694.

IN THE INSTANT ACTION, THE PLAINTIFF-
APPELLANT HAS BEEN VIGOROUSLY AND DILIGENTLY
PROSECUTING HIS CLAIM THROUGHOUT. IN JUNE
1975, THE TRIAL COURT DENIED THE
APPELLANT'S MOTION TO COMPEL THE APPELLEE
TO ANSWER CERTAIN INTERROGATORIES.

IMMEDIATELY THEREAFTER, THE APPELLANT MOVED FOR A REARGUMENT OF THE SAID MOTION. THE TRIAL COURT DECLINED TO RULE ON THE SAID MOTION FOR NEARLY 2X120 DAYS, IN VIOLATION OF SECTION 706(b)(5) OF TITLE VII OF THE CIVIL RIGHTS ACT OF 1964, AS AMENDED, 42 USC 2000e-5(b)(5).

IMMEDIATELY AFTER THE APPELLANT MOVED TO THE COURT OF APPEALS AGAINST THE DENIAL OF A PRELIMINARY INJUNCTION AGAINST AUIS (DOCKET NO. 76-7039), THE TRIAL COURT FELT THE URGE OF DISMISSING THE APPELLANT'S CLAIM, AND SCHEDULED THE HALDER ACTIONS FOR DISMISSAL (ANY MAN WITH WISDOM WOULD COME TO THE SAME CONCLUSION IF HE LOOKS AT THE NEW YORK LAW JOURNAL OF 02-10-1976).

AT THE TRIAL FOR DISMISSAL, SPERRY RAND, QUOTRON, AND INFORMATICS WERE READY TO PROCEED; REA, GENERAL TELEPHONE, AND ITT WERE NOT. THE APPELLANT CROSS-MOVED FOR

SUMMARY JUDGMENT AGAINST THE LATTER THREE. THOSE THREE FILES ARE BEAUTIFUL ; THEY DO NOT WANT THE COURT OF APPEALS TO SEE THOSE FILES NOW (THE COURT OF APPEALS HAS ALREADY SEEN ONE BEAUTIFUL FILE — HALDER V AVIS, 76 CIVIL 1552, ED OF NY).

THE DISMISSAL OF THE COMPLAINT, AS IS ABUNDANTLY CLEAR, WAS "CONTRARY TO THE FIRST PRINCIPLES OF THE SOCIAL COMPACT, AND OF THE RIGHT ADMINISTRATION OF JUSTICE." MEVEIGH V UNITED STATES, 1871, 78 U.S. (11 WALLACE) 259, 267. "IT WAS, IN FACT, A PURE ARBITRARY EDICT, CLOTHED IN THE FORM OF A JUDICIAL SENTENCE." WINDSOR V MEVEIGH, 1876, 93 U.S. (23 WALLACE) 276, 278.

THE JUDGE SHOULD EVER BE MINDFUL THAT THE "COURTS EXIST TO SERVE THE PARTIES, AND NOT TO SERVE THEMSELVES, OR TO PRESENT A RECORD WITH RESPECT TO DISPATCH OF BUSINESS." ALMANCE INDUSTRIES, INC. V FILENE'S,

291 F.2d 142, 146, CA 1 1961. "A COURT HAS
THE RESPONSIBILITY TO DO JUSTICE BETWEEN
MAN AND MAN ; AND GENERAL PRINCIPLES
CANNOT JUSTIFY DENIAL OF A PARTY'S FAIR
DAY IN COURT EXCEPT UPON A SERIOUS
SHOWING OF WILLFUL DEFAULT." GILL V STOLOV,
240 F.2d 669, 670, CA 2 1957.

CONCLUSION

THE DEFENDANT'S DEFENDANT'S ABUSE OF
DISCRETIONARY POWER IN DISMISSING THE
COMPLAINT SHOULD, IN ITS ENTIRETY, BE
REVERSED.

RESPECTFULLY SUBMITTED,

Biswanath Halder
Defellant Pro Se

BISWANATH HALDER
173-17 45 AVENUE
FRESH MEADOWS, NY 11365
TELEPHONE : 212-539-2305

DATED : Queens, New York

July 21, 1976

NEW YORK TIMES

THE NEW YORK TIMES, SUNDAY, 1

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06 - 09 - 1974

EXHIBIT "G"

NEW YORK TIMES

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EXHIBIT "H"

NEW YORK TIMES

Programmer/Analysts

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EXHIBIT "I"

NEW YORK TIMES

Programmer Analysts

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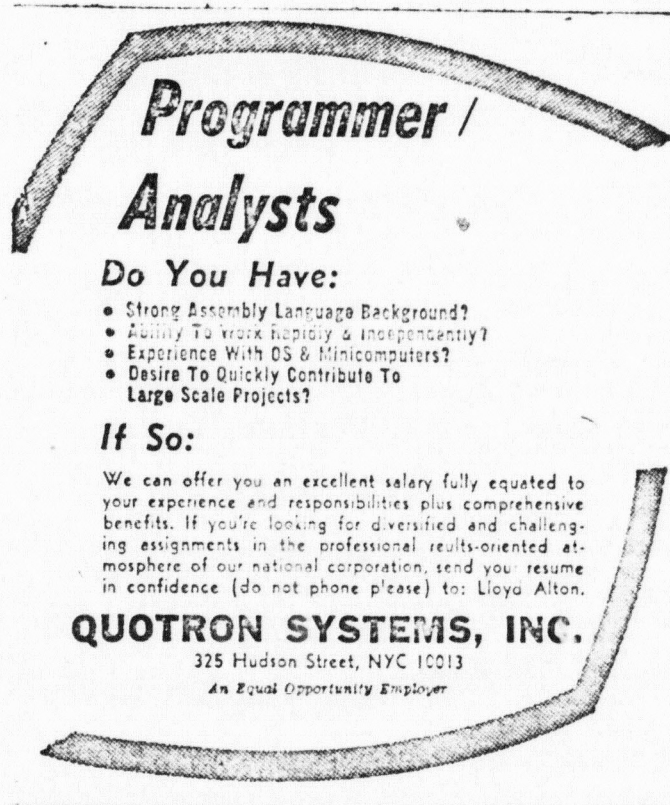
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EXHIBIT "J"

NEW YORK TIMES



**Programmer /
Analysts**

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EXHIBIT "K"

NEW YORK TIMES

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EXHIBIT "L"

NEW YORK TIMES

PROGRAMMER ANALYST

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NEW YORK TIMES

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EXHIBIT "N"

NEW YORK TIMES

PROGRAMMER ANALYST

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NEW YORK TIMES

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EXHIBIT "R"

NEW YORK TIMES

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04 - 12 - 1971

EXHIBIT "T"

Biswanath HALDER
173-17 65th Avenue
Fresh Meadows, New York 11365

PROGRAMMER/ANALYST

Tel: (212) 539 - 2305

Graduated from the University of Calcutta in 1963 with a B.S. in Electrical Engineering, specializing in line communications and electronics. After graduation served the Indian Army, and then proceeded to West Germany, where gained experience in the manufacture of electrical measuring instruments. Entered the computer industry in 1967, and have had experience in diagnostic testing and applications programming. Familiar with the following machines and languages: IBM S/360-30 BAL, Redcor 70 assembly language, Honeywell 316/416/516 assembly language, English Electric M-2140 basic usercode.

EXPERIENCE

4/70-7/70 Darus Dat-Com Limited, Wayne, New Jersey -- Programmer/Analyst

Participated in the design and programming of a "Computer-Assisted Instruction" project. This is an on-line system written in assembly language for the Honeywell H316 computer, and is used to develop basic learning skills in mathematics and English for grade-school pupils.

1/70-3/70 Vacationing in India.

6/69-12/69 Penta Computer Associates, New York, New York -- Programmer

Participated in the programming and implementation of a deposit activity analysis system for a major trust company. The system was written in BAL to operate on System 360-30 under DOS. Also participated in the programming and implementation of the data entry verification phase of the Key-Logic system on the Redcor 70 midi-computer. This system is a multi-terminal keyboard processing system designed to encompass the entire range of data entry operations.

6/68-5/69 Honeywell Limited, Hemel Hempstead, England -- Software Analyst

Designed and programmed (in assembly language) the diagnostic tests for peripheral devices (line printer, card reader, paper-tape reader and punch, light pen, digital incremental plotter) for the Series 16 computers.

8/67-6/68 International Computers Limited, Stroke-on-Trent, England -- Programmer

Programmed (in basic usercode) the diagnostic tests for the Multi-level Interrupt Unit and the System 4 I/O Processor of the M-2140 computer.

PERSONAL DATA

Age: 35 years
Marital Status: Single
Height: 5'8½"
Weight: 158 lbs.
Nationality: Indian (Permanent Resident in the U.S.)
Draft Status: 5A (December 1969)

EXHIBIT "U"

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by Lawrence Techner
7/22/76
4:45 P.M.